UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #6**
Progress
Sherwin-Williams Plant Fire Response
A6WT
Garland, TX
Latitude: 32.9080210 Longitude: -96.6667990

To: Craig Carroll, Region 6
Brendan Roache, OEM
Anthony Buck, TCEQ

From: Eric Delgado, FOSC
Date: 8/12/2023
Reporting Period: 8/12/2023

1. Introduction

1.1 Background

Site Number:	A6WT	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Assessment
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/7/2023	**Start Date:**	8/7/2023
Demob Date:		**Completion Date:**	
CERCLIS ID:	TXN000622299	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

CERCLA emergency response with potentially responsible party (PRP) oversight at a paint manufacturing facility.

1.1.2 Site Description

1.1.2.1 Location

The incident occurred at an active paint manufacturing facility in Garland, Texas. The facility is located within a primarily commercial/industrial area at 701 South Shiloh Road, Garland, Dallas County, Texas 75042 (Site). A large residential neighborhood is located approximately 0.25 miles southeast of the Site. Two bodies of water, Stream 2C4 and Duck Creek, flow through the residential neighborhood.

1.1.2.2 Description of Threat

The following table provides chemicals that were potentially released from the facility :

Hydrogen Cyanide	Ammonia	Ethylene glycol	n-Butyl acrylate
PFAS	Ammonium hydroxide	Ethylene glycol monohexyl ether	Nonylphenoxypoly(ethoxy)ethanol
1,2,4-Trimethylbenzene	Ammonium persulfate	Ethelyne glycol monoprophyl ether	o-Xylene
1,4-Dioxane	Benzene	Ethelyne oxide	Pentadecaflourooctanoic acid (PFAO)
1-Butanol	Bisphenol A	Formaldehyde	Propylene oxide
2-Butoxyethanol	Cumene	Formic acid	Sodium nitrate
2-Pentanone, 4-methyl-	Cyclohexane	Hexachlorobenzene	Styrene
2-Phenoxyethanol	Dibenzoyl peroxide	Hexamethylene diisocyanate	Tert-Butyl alcohol
4,4-Methylenediphenyl diisocyanate	Diethanolmine	Hydroquinone	Toluene
4-Nonylphenol, branched and linear, ethoxylated	Diethylene glycol monobutyl ether	Isocyanic acid, polymethylenepolyphenylene ester	Triethylamine
Acetaldehyde	Diethylene glycol monoethyl ether	Methyl alcohol	Xylenes
Acrolein	Epichlorohydrin	Methyl methacrylate	Zinc pyrithione
Acrylamide	Ethyl acrylate	Napthalene	
Acrylic Acid	Ethylbenzene	Naphthenic acids, zinc salts	

The facility was unable to shutoff the fire suppression system during the incident which resulted in the release of an unknown amount of aqueous fire-fighting foam (AFFF) and firewater into storm drains that discharged into Stream 2C4. Stream 2C4 flows into Duck Creek which ultimately flows into the East Fork of the Trinity River. Several odor complaints were reported by members of the community to EPA and TCEQ.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA, TCEQ, the City of Garland, and Sherwin Williams continue to operate in Unified Command to accomplish the following incident objectives:

(1) Conduct all field activities in a manner to ensure health and safety following the HASP.

(2) Identify critical resource needed by the Incident Command and field personnel.

(3) Establish Emergency Response procedures to accomplish the following.

a. Ensure the safety of the public and responders.
b. Conduct air monitoring in neighboring communities, sensitive receptors, commercial lots, and/or any industrial properties near the site.

c. Conduct General Facility Assessment.
d. Assess firewater/AFFF runoff and its potential affects to human health and the environment by entering Creek 2C4.
e. The RP is collecting multimedia samples at the Site, and downstream of the Site.
f. The RP is assessing and documenting polymer tank integrity and temperatures at the Site which could potentially lead to secondary explosions.

(4) Utilize EPA GeoPlatform dashboards to track Site operations.
(5) Delineate impacted waters of the United States or impacted soils.

(6) Remediate the impacted portion of Duck Creek and any other impacted waters of the United States or impacted soils.

(7) Prevent the further migration of released materials along Duck Creek and any other impacted waterways.

(8) Recover released materials, stage the resulting waste and dispose of the resulting waste.
(9) Sample and analyze for residential contaminants within the soil and water present at impacted areas.

2.1.2 Response Actions to Date

EPA obtained and reviewed analytical results from Sherwin Williams sampling efforts in impacted waterways on 8/10/2023. The following contaminants have been observed at levels above site specific screening levels in Stream 2C4 and Duck Creek between 8/7/2023 and 8/10/2023: antimony, lead, manganese, benzene, n-butanol, and 1,4-Dioxane. Lead and n-butanol are the only contaminants that have been observed on multiple occasions between 8/7/2023 and 8/10/2023. There have been no observed levels of PFAS compounds associated with AFFF above site specific screening levels from samples collected in impacted waterways between 8/7/2023 and 8/10/2023. Additional information regarding sampling locations, contaminant levels, and site specific screening levels can be found in the 8/7-10/2023 Surface Water Analytical Data Tables and site dashboard referenced in the *7. Situational Reference Materials* section of this POLREP. EPA continued providing oversight and documentation of Sherwin Williams containment and recovery efforts and surface water sampling efforts.

Sherwin Williams continued recovering AFFF impacted waters using a foam fractionation process at the Wynne Park dam location and conducted community air monitoring near the dam location as aerating impacted waters liberates dissolved VOCs and SVOCs out of the water column. No VOC readings above instrument detection limits were observed in the nearby community. Additionally, Sherwin Williams constructed a second dam approximately 150 feet downstream of the upstream dam location. Sherwin Williams began installing a final containment and second foam fractionation recovery location off E Malloy Bridge Road in Seagoville, TX. The nearest residence to the final containment and recovery location is approximately 1 mile away so Sherwin Williams did not conduct air monitoring at the location. Sherwin Williams also continued door-to-door requests to right of entries to properties and obtained approximately 5 additional right of entry agreements.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
The Potentially Responsible Party (PRP) is Sherwin Williams.

2.1.4 **Progress Metrics**:

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
AFFF/Firefighting water	Water/Product Mixture	~775,000 gallons	Various	N/A	

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities
EPA, TCEQ, and Texas Parks and Wildlife will remain on-site and continue to provide oversight and documentation Sherwin Williams' containment and recovery efforts, sampling operations, and wildlife impact assessment efforts.

Sherwin Williams will continue recovery efforts with vacuum trucks and frac tanks to recover AFFF fluids and firewater from impacted waterways. Installation and maintenance of the containment structures (dams, berms, etc.) will also be monitored by Sherwin Williams. Based on the analytical results received over the last few days and the lack of significant amounts of AFFF past Duck Creek, EPA recommended Sherwin Williams move the final containment and second foam fractionation recovery location off E Malloy Bridge Road in Seagoville, TX further upstream. Sherwin Williams will conduct drone overflights of impacted waterways to determine a more appropriate location to place the final containment and second foam fractionation recovery location . Sherwin Williams will continue community outreach efforts in an effort to obtain right of entries to access portions of Stream 2C4 and Duck creek which run through several residential properties.

2.2.2 Issues

Unified Command was notified of a water line break upstream of the Wynne Park dam location. The water line was shutoff not long after breaking however, efforts to bring the water line back into service might result in more water being discharged upstream of the Wynne Park dam location. There is a concern that a significant amount of discharged water could result in a breach of the Wynne Park dam. Unified Command is closely coordinating with local water authorities to determine the best course of action.

2.3 Logistics Section

No information to report.

2.4 Finance Section

2.4.1 Narrative
No information to report at this time.

2.5 Other Command Staff

2.5.1 Safety Officer
No information to report.
2.5.2 Liaison Officer
No information to report.
2.5.3 Information Officer
No information to report.

3. Participating Entities

3.1 Unified Command
EPA, TCEQ, and Sherwin Williams will continue to operate in Unified Command.

3.2 Cooperating Agencies
EPA is working closely with the following federal, state and local agencies during this response: US Department of the Interior, US Fish and Wildlife Service, Texas Parks and Wildlife Department, TDEM, TCEQ, City of Garland Fire Department, City of Garland Police Department, City of Garland Emergency Management, North Texas Municipal Water District.

4. Personnel On Site

- EPA FOSCs - 2
- EPA Toxicologist -1
- EPA PIO -1

- EPA START - 7
- TCEQ
- TDEM
- City of Garland Emergency Management
- Sherwin Williams
    - Miller Environmental
    - Center for Toxicology and Environmental Health (CTEH)
    - TAS Environmental
    - Cactus Environmental

5. Definition of Terms

above ground storage tank (AST)
aqueous fire-fighting foam (AFFF)
Airborne Spectral Photometric Environmental Collection Technology (ASPECT)
Center for Toxicology and Environmental Health (CTEH)
chemicals of concern (CoCs)
EPA Federal On-Scene Coordinator (FOSC)
Garland Fire Department (GFD)
Garland Police Department (GPD)
meter (m)
particulate matter less than 2.5 micrometers in diameter (PM 2.5)
parts per million (ppm)
polyfluorinated compounds (PFCs)
Potentially Responsible Party (PRP)
Superfund Technical Assessment and Response Team (START)
Texas Commission of Environmental Quality (TCEQ)
volatile organic compounds (VOCs)

6. Additional sources of information

6.1 Internet location of additional information/report
Additional information may be obtained at response.epa.gov/SherwinWilliamsPlantFireResponse.

6.2 Reporting Schedule
A progress POLREP will be submitted as determined appropriate by the EPA OSC and a final POLREP will be submitted upon completion of the response.

7. Situational Reference Materials

8/7-10/2023 Surface Water Analytical Data Tables

Site Dashboard